

Exhibit 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ABDULLAH JAMES GEORGE)
WILSON, on behalf of)
himself and others)
similarly situated,) Case No.
Plaintiff,) 1:14-cv-2477
(JPO)(RLE)
vs.)
CORELOGIC SAFERENT,)
LLC,)
Defendant.)
-----)

*****CONFIDENTIAL*****

DEPOSITION OF ABDULLAH JAMES GEORGE WILSON
New York, New York
Thursday, July 28, 2016

Reported By:
CATHI IRISH, RPR, CRR, CLVS, CCR

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July 28, 2016
10:00 a.m.

Deposition of ABDULLAH JAMES
GEORGE WILSON, held at the offices of
Troutman Sanders LLP, 875 Third
Avenue, New York, New York, before
Cathi Irish, a Registered Professional
Reporter, Certified Realtime Reporter,
and Notary Public of the State of
New York.

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A P P E A R A N C E S:

LEGAL ACTION CENTER

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BY: DAVID N. ANTHONY, ESQ.

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2 ABDULLAH JAMES GEORGE WILSON, called as
3 a witness, having affirmed to tell the
4 truth, was examined and testified as
5 follows:

6 EXAMINATION

7 BY MR. ANTHONY:

8 Q. My name is David Anthony. I'm an
9 attorney at Troutman Sanders in Richmond,
10 Virginia and I'm here today representing
11 the defendant CoreLogic SafeRent LLC.

12 Have you given your deposition
13 before?

14 A. Pardon me?

15 Q. Have you given your deposition
16 before?

17 A. No.

18 Q. You've never given a deposition
19 in any case?

20 A. Yes.

21 Q. Could you state your name for the
22 record?

23 A. Abdullah Wilson, A-B-D-U-L-L-A-H.

24 Q. That's your full name, are there
25 any other juniors or middle names or

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2 knowledge calls for speculation?

3 BY MR. ANTHONY:

4 Q. To the best of your knowledge, do
5 you recall checking the New York
6 Department of Corrections' website as to
7 the status of your conviction prior to
8 April 2012?

9 A. No.

10 Q. So if you can point -- look at
11 Exhibit 1, can you tell me what's
12 inaccurate about this document?

13 A. Page by page?

14 Q. Page by page. Take your time.

15 A. (Witness perusing document.)

16 I have a question. If you may,
17 will you be more precise in what is it I'm
18 looking for?

19 Q. Am I correct that you are
20 alleging that CoreLogic provided an
21 inaccurate report to Eastchester about
22 you?

23 A. I'm alleging that they provided
24 inaccurate and incomplete information
25 about me.

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2 Q. So what in Exhibit 1 is
3 inaccurate and incomplete?

4 A. (Witness perusing document.)
5 Do you know what the State case
6 number is?

7 Q. Off the top of my head I don't.

8 A. On page 8?

9 Q. Off the top of my head, I don't.

10 A. That's what I'm asking you
11 because I have no idea what it's referring
12 to when it says case number New York State
13 and tracking case number is 95A8435
14 New York State, reporting agent DOC. And
15 again, Case and State I.D.

16 To the best of my knowledge, it
17 says report summary.

18 Q. What page?

19 A. Page 8. It says disposition,
20 conviction, 12/05/95 which is incorrect.
21 Sentencing date, 12/05/95 which is
22 incorrect.

23 Q. What was the disposition date?

24 A. Disposition? The date of
25 conviction?

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2 Q. You said that the disposition
3 date was incorrect. Why was it incorrect?

4 A. What is the disposition date?

5 Q. You said it was incorrect.

6 A. Uh-huh. This says date filed.
7 This was filed -- all the dates are the
8 same. So the filing date, the conviction
9 date -- I mean the disposition date as
10 well as the sentence date all happened on
11 the same date. This date has no reference
12 to my conviction.

13 Q. Okay. So what you're saying is
14 you think that the dates for the file date
15 and the disposition date and the sentence
16 date are incorrect?

17 A. Yes.

18 Q. What should they be?

19 A. One, I was convicted in October.
20 I was sentenced in November. And
21 disposition, I don't know what that is or
22 why are all three dates the same.

23 Q. Okay. What else in Exhibit 1 is
24 inaccurate or incomplete?

25 A. At present, I really am trying to

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2 A. That I'm black?

3 Q. -- that the reporting of your
4 race as black was inaccurate? Are we all
5 in agreement on that?

6 MR. SEARLES: Yes.

7 THE WITNESS: Yes.

8 BY MR. ANTHONY:

9 Q. So if you go to paragraph 21 of
10 the complaint, do you see that?

11 A. Yes.

12 Q. Can you point me where in Exhibit
13 1 are the inaccuracies that are reflected
14 in paragraph 21 of the complaint?

15 A. As you see, it says the report
16 was inaccurate and contained public
17 information that was neither complete nor
18 up to date and which was legally obsolete
19 so the information that was provided to
20 Eastchester was not updated.

21 Q. It was accurate but not up to
22 date?

23 A. And it wasn't even accurate
24 because if you go down to third, as
25 pertaining to the dismissal -- fourth.

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2 Q. What I'm trying to get at,
3 Mr. Wilson, is what's inaccurate and
4 what's not up to date?

5 A. The case number. What is the
6 case number? The case number that is
7 there, that's inaccurate.

8 Q. So the case number on page 8 --

9 A. Yes.

10 Q. -- of Exhibit 1 where it says
11 case number, colon, middle of the page,
12 you believe that's inaccurate?

13 A. Well, I'm asking what is the case
14 number? What defines a case number?

15 Q. I'm asking you --

16 A. It's inaccurate.

17 Q. It's inaccurate?

18 A. Yes. That is a personal
19 identification number by the State of
20 New York. That was my name, not my --

21 Q. This 95A8435?

22 A. When you enter the correction
23 system --

24 Q. Let's not talk over each other.
25 You're saying this is not an

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2 actual case number but is the personal
3 identification for you in the
4 incarceration system?

5 A. Yes, it is.

6 Q. So that's incorrect?

7 A. Yes, it is.

8 Q. Or inaccurate, let's use the
9 right words.

10 A. Yes.

11 Q. So in addition to that, it says
12 here in your complaint that the reference
13 conviction had been vacated and the
14 charges had been dismissed and sealed
15 years before, on or about October 19,
16 2009.

17 So it's inaccurate because it
18 does not contain that information?

19 A. Doesn't reflect it.

20 Q. Or incomplete?

21 A. Whichever suits.

22 Q. So the information here about the
23 conviction, there was a conviction but
24 it's not up to date to include that it had
25 been vacated and that the charges had been

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2 dismissed or sealed years before on or
3 about October 19, 2009?

4 A. This says disposition so
5 therefore the disposition date also says
6 12/05.

7 Q. You think that's wrong, too?

8 A. Yes, because I was convicted in
9 October.

10 Q. Okay.

11 A. I was sentenced in November.

12 Q. So then let's go down to where it
13 says fourth on the third line from the
14 bottom of paragraph 21, the report
15 misidentified the file date number of the
16 record. What does that mean? Is that
17 this line right here (indicating) where it
18 says file date, colon?

19 MS. WELBY: Objection, asked and
20 answered.

21 BY MR. ANTHONY:

22 Q. You can answer the question.

23 A. File date. What file date? Was
24 this filed on that date? Because reading
25 this, it says that I was convicted on this

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2 date, it was filed on that date and then
3 sentenced on that date. All this happened
4 on the same date. That's how it reads so
5 this is inaccurate information.

6 Q. To the best of your knowledge,
7 there was nothing significant about your
8 conviction that occurred on December the
9 5th, 1995?

10 A. I was convicted on October 3rd of
11 1995. I don't know what date this was. I
12 was in prison. I was sentenced on
13 November 15, 1995.

14 Q. If you go to the next sentence in
15 paragraph 21 on Exhibit 4, it
16 misidentified the state I.D. number. Am I
17 correct that you're pointing to what's
18 right next to the case number that we
19 previously discussed, still on page 8?

20 A. Yes.

21 Q. Do you know what that number is,
22 the New York state I.D., do you know what
23 that means or why it's inaccurate?

24 A. It's a City number.

25 Q. It's a what number?

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2 A. It's a City number.

3 Q. As a City number, it's accurate
4 but as a State number, it's inaccurate
5 because it's a City number, not a State
6 number?

7 A. Right.

8 Q. So really it should have said
9 New York City I.D., is that what you're
10 saying?

11 A. Basically, yes.

12 Q. So other than what is described
13 in paragraph 21 of Exhibit 4, sitting here
14 today is there anything that you are
15 contending is inaccurate or incomplete in
16 Exhibit 1?

17 A. I believe I answered that but I
18 will try my best again. It's incomplete
19 in that it doesn't reflect --

20 Q. No, no, no, you've answered this.
21 I'm saying is there anything that we
22 haven't covered?

23 A. I wouldn't know the questions
24 you're going to ask me.

25 Q. Let me try it again.

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2 C E R T I F I C A T E

3 STATE OF NEW YORK)

4 : ss.

5 COUNTY OF NASSAU)

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7 I, CATHI IRISH, a Registered
8 Professional Reporter, Certified Realtime
9 Reporter, and Notary Public within and for
10 the State of New York, do hereby certify:

11 That ABDULLAH JAMES GEORGE WILSON, the
12 witness whose deposition is hereinbefore
13 set forth, was duly sworn by me and that
14 such deposition is a true record of the
15 testimony given by the witness.

16 I further certify that I am not
17 related to any of the parties to this
18 action by blood or marriage, and that I am
19 in no way interested in the outcome of
20 this matter.

21 IN WITNESS WHEREOF, I have hereunto
22 set my hand this 8th day of August, 2016.

23 

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25 CATHI IRISH, RPR, CRR, CLVS, CCR